

Amy F. Sorenson, Esq.
 Nevada Bar No. 12495
 Blakeley E. Griffith, Esq.
 Nevada Bar No. 12386
 Holly E. Cheong, Esq.
 Nevada Bar No. 11936
 SNELL & WILMER L.L.P.
 3883 Howard Hughes Pkwy, #1100
 Las Vegas, Nevada 89169
 Telephone: 702-784-5200
 Facsimile: 702-784-5252
 Email: asorenson@swlaw.com
 bgriffith@swlaw.com
 hcheong@swlaw.com

Attorneys for Defendant Bank of America, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
 TELEPHONY CONSULTANTS, MRZ
 MANAGEMENT, LLC, DONOR
 RELATIONS, LLC, TPFE, INC., AMERICAN
 TECHNOLOGY SERVICES, COMPLIANCE
 CONSULTANTS, CHROME BUILDERS
 CONSTRUCTION, INC., and UNIFIED
 DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and
 JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO
 EXTEND TIME TO PRODUCE
 DOCUMENTS IN RESPONSE TO
 COURT'S ORDER PARTIALLY
 GRANTING PLAINTIFFS' MOTION TO
 COMPEL, ECF NO. 257**

(SECOND REQUEST)

Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC;
 Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants;
 Chrome Builders Construction, Inc.; and Unified Data Services (the "Plaintiffs") and Defendant
 Bank of America, N.A. ("BANA"), by and through their respective undersigned counsel of record,
 submit this Stipulation and Proposed Order for a one-week extension of BANA's deadline to
 produce certain documents in response to this Court's Order partially granting Plaintiffs' Motion
 to Compel (ECF No. 257) (the "Order"). This is the Parties' second request for an extension of

1 the production deadline for the Order and is not intended to cause any delay or prejudice to any
2 party.

3 The Order was filed on October 3, 2022, and ordered BANA to produce certain
4 documents within 30 days. (ECF No. 257 at 4:12.) The Parties obtained an extension from
5 November 2, 2022, the initial deadline, to November 9, 2022. (ECF No. 264.) The Parties
6 request another one-week extension until November 16, 2022.

7 The reason for the extension is the Parties discussed their understanding of the Order on
8 November 1, 2022, after Plaintiffs' counsel returned from multiple trips. The Parties have come
9 to an understanding on the parameters of the document production, which differed from BANA's
10 initial understanding. For this reason, BANA needs additional time to finalize the document
11 production.

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
2 for BANA to produce documents pursuant to the Order is extended to and through November 16,
3 2022.

4 **IT IS SO STIPULATED.**

5 Dated: November 4, 2022

Dated: November 4, 2022

6 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

7 /s/ Robert G. Bernhoft

/s/ Blakeley E. Griffith

8 Robert G. Bernhoft, Esq.

Amy F. Sorenson, Esq.

9 Admitted *Pro Hac Vice*

Nevada Bar No. 12495

10 Wisconsin Bar No. 1032777

Blakeley E. Griffith, Esq.

11 Thomas E. Kimble, Esq.

Nevada Bar No. 12386

12 Admitted *Pro Hac Vice*

Holly E. Cheong, Esq.

13 Illinois Bar No. 6257935

Nevada Bar No. 11936

14 Daniel James Treuden, Esq.

3883 Howard Hughes Parkway, Suite 1100

15 Wisconsin Bar No. 1052766

Las Vegas, NV 89169

16 1402 E. Cesar Chavez Street

Attorneys for Defendant Bank of America,

17 Austin, Texas 78702

N.A.

18 Joel F. Hansen, Esq.

19 Nevada Bar No. 1876

20 Hansen & Hansen, LLC

21 9030 W. Cheyenne Avenue, #210

22 Las Vegas, Nevada 89129

23 *Attorneys for Plaintiffs*

24 **IT IS SO ORDERED.**

25 

26 UNITED STATES MAGISTRATE JUDGE

27 DATED: November 7, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO PRODUCE DOCUMENTS IN RESPONSE TO COURT'S ORDER PARTIALLY GRANTING PLAINTIFFS' MOTION TO COMPEL, ECF NO. 257 (SECOND REQUEST)** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: November 4, 2022

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer
L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702-784-5200